

1 PILLSBURY WINTHROP SHAW PITTMAN LLP
 ROBERT C. PHELPS 106666
 2 robert.phelps@pillsburylaw.com
 MICHELLE R. WATTS 232460
 3 michelle.watts@pillsburylaw.com
 50 Fremont Street
 4 Post Office Box 7880
 San Francisco, CA 94120-7880
 5 Telephone: (415) 983-1000
 Facsimile: (415) 983-1200
 6
 Attorneys for Plaintiff
 7 CHEVRON U.S.A. INC.

8 UNITED STATES DISTRICT COURT
 9 NORTHERN DISTRICT OF CALIFORNIA
 10 SAN FRANCISCO DIVISION

11	_____)	
12	CHEVRON U.S.A. INC.,)	No. C 05-03276 WHA
13)	
14	Plaintiff,)	<u>STIPULATION AND [PROPOSED]</u>
15	vs.)	<u>ORDER EXTENDING TIME TO</u>
16	SSD & ASSOCIATES,)	<u>COMPLETE VOLUNTARY ADR</u>
17	Defendant.)	<u>PROCEDURE</u>
18	_____)	

19 Plaintiff CHEVRON U.S.A. INC. and Defendant SSD & ASSOCIATES, through
 20 their respective counsel, and following discussions with the assigned mediator in this matter
 21 (William Quinby, Esq.), hereby request that the Court extend the time for completion of
 22 voluntary ADR to May 20, 2006, for the reasons set forth below.

23 The parties have agreed to a voluntary mediation of this dispute and have scheduled
 24 such mediation before William Quinby, Esq., of Wulff, Quinby & Sochynsky, 1901
 25 Harrison Street, Suite 1420, Oakland, CA 94612. The parties previously had scheduled a
 26 mediation before Mr. Quinby for April 13, 2006. This request for additional time for
 27 completion of mediation comes as a result of discussions with Mr. Quinby regarding the
 28 likelihood of settlement at mediation at this time, given the posture of the case.

1 For the foregoing reasons, the parties respectfully request that the deadline for
2 completing mediation be extended an additional 30 days, to May 20, 2006.

3 Dated: April 11, 2006.

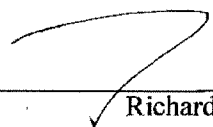
4 PILLSBURY WINTHROP SHAW PITTMAN LLP
5 ROBERT C. PHELPS
6 MICHELLE R. WATTS
7 50 Fremont Street
8 Post Office Box 7880
9 San Francisco, CA 94120-7880

10 By /s/ Robert C. Phelps
11 Robert C. Phelps

12 Attorneys for Plaintiff
13 CHEVRON U.S.A. INC.

14 Dated: April 11, 2006.

15 PEREZ & MILLER
16 Richard L. Perez
17 3730 Mt. Diablo Boulevard
18 Suite 335
19 Lafayette, CA 94549

20 By 
21 Richard L. Perez

22 Attorneys for Defendant
23 SSD & ASSOCIATES

1 Based upon the representations of counsel herein and good cause appearing, it is
2 hereby ORDERED that the deadline for completion of voluntary ADR proceedings in this
3 case is extended to May 20, 2006.

4 Dated: April 17 2006.

5
6
7 By

